VIA ECFS

Comments of Monroe Electronics on Triggered CAP Polling, in Relation to the Amendment of Part 11 of the Commission's Rules Regarding the Emergency Alert System, as well as the Commission's Initial Findings Regarding the 2016 Nationwide EAS Test.

In order to maintain close coordination with coordination with the FCC, FEMA and other manufacturers of EAS equipment, Monroe Electronics wishes to inform the FCC of its plans to move ahead with implementation of certain enhancements referenced as desirable in a recent release issued by the FCC's Public Safety And Homeland Security Bureau summarizing its initial findings regarding the September 2016 nationwide EAS test.

Such enhancements had previously been contemplated by Monroe Electronics, and we believe our approach as outlined below is permissible within the Commission's current rules governing the Emergency Alert System.

1 Introduction

The Commission, in its discussion of "Opportunities to Strengthen the EAS" within the above referenced release, notes that the "most timely and content-rich version of an alert" would be ensured by requiring EAS Participants check the Internet-based IPAWS feed upon receiving a broadcast alert and transmit the corresponding CAP alert, if available.[1]

We concur with this statement. Monroe Electronics/Digital Alert Systems, as early as 2010, had suggested the need for a mechanism in CAP EAS equipment to automatically seek and retrieve CAP messages, if a broadcast EAS message were received first. In essence, our concept was that the arrival of a message from a broadcast EAS monitoring source would

[1] "Public Safety and Homeland Security Bureau Releases Its Initial Findings Regarding the 2016 Nationwide EAS Test", released December 28, 2016.

585-765-2254 fax 585-765-9330

100 Housel Ave. | Lyndonville | NY | 14098

www.monroe-electronics.com

trigger the device to immediately seek whether there was a matching CAP message on the IPAWS OPEN Internet-based source.

We revisited this concept in our ex parte comments filed with the Commission on May and July 2016, respectively, in which we proposed a triggered polling feature enabling EAS equipment to immediately poll the CAP source (IPAWS) upon receipt of any FSK-based EAS message.

1. If a broadcast source EAS message is received, the EAS equipment would immediately poll IPAWS. If the EAS equipment identifies an identical corresponding CAP message, then the CAP message would instead be utilized, since it would presumably be more informative than the broadcast EAS message.
2. However, if the EAS equipment does not find a CAP message that corresponds to the FSK message, then the EAS equipment would proceed with the received FSK EAS message.

This represents a relatively simple and straightforward solution whereby even if a broadcast EAS message arrives first, then (1) video programmers may obtain and use the more informative textual contents of the CAP message (if one is available),2 and (2) allow all EAS participants to obtain the potentially higher quality audio resource of a CAP message.3 This method gives preference to the more informative CAP message ("IP-first"), but allows the broadcast EAS system to maintain its critical role if there is no corresponding CAP message, or if the Internet is temporarily unavailable for CAP polling.

In addition to the concerns noted by the FCC in its release of 28 December 2016, we feel this proposed mechanism may alleviate the concerns of numerous EAS Participants, some of

---

[2] Even in the case of audio services (AM/FM/Satellite), the benefit of obtaining the more informative CAP message may provide newsrooms and other services additional information that may be missed if the "duplicate" CAP message is merely filtered out when an identical EAS message arrives first.

[3] See Comments of Monroe Electronics in Regards to the Notice of Proposed Rulemaking, filed 26 May 2016, at pp 11-15, and Reply Comments of Monroe Electronics, filed 9 July 2016.

which have opted to cease airing EAS messages (aside from the required Event codes) because of the gap between the audio and the textual portions of the message.[4]

The proposed method also provides the opportunity for multilingual broadcasters to obtain alert messages in the language(s) of their choice (again, presuming the CAP message contains multiple language elements).

2 Monroe Electronics intends to introduce a feature to enable automatic and immediate polling of IPAWS OPEN when an EAS message is received via broadcast monitoring.

Monroe Electronics wishes to inform the FCC that it intends to incorporate this feature in a future release for all DASDEC-II and R189 One-Net SE CAP EAS equipment.[5] Users would be able to select this feature to enable the DASDEC-II and One-Net SE to immediately poll the Internet-based IPAWS OPEN source for a CAP message upon receipt of an FSK-based EAS message from broadcast sources.

We intend to provide this capability for any civil, weather or test Event code, except for the EAN Event code, or the NPT Event code in the case of a nationwide test of the EAS, which must be transmitted immediately.

We believe this to be fully in compliance with the current EAS rules at §11.51 (n), as any delay or latency imposed by an immediate automatic CAP poll would amount to merely seconds.[6] The software modifications we discuss below at a high level are in adherence with current rules governing the EAS system. We do not believe that any additional action on the part of the FCC is necessitated, insofar as these changes would pertain to civil, weather and test Event codes that are already allowed delays well in excess of any minor latency this automatic polling option may entail.

---

[4] For example, we are aware of at least one television broadcast group has apparently eschewed broadcasting any but the required EAS messages, because of the concern that the text display will not match the audio content in the case of EAS-derived messages.

[5] Our version 3.1 release is currently schedule for January 2016. This automatic CAP polling feature would be included in an upcoming software update release.

[6] §11.51 (n) "EAS Participants may employ a minimum delay feature, not to exceed 15 minutes, for automatic interruption of EAS codes. However, this may not be used for the EAN Event code, or the NPT Event code in the case of a nationwide test of the EAS, which must be transmitted immediately. The delay time for an RMT message may not exceed 60 minutes."

However, as discussed below, the extension of this feature for the EAN and NPT Event Codes would likely require clarification from the FCC as to whether such an triggered polling method is permissible under the current rules, which would seem to require the EAN and NPT to be transmitted immediately upon receipt of a broadcast EAS source message, if that were to arrive first.

2.1 Operation for Non-National (Civil, Weather and Test) Event Codes

Our current intent is to make this immediate CAP polling feature optional and selectable by Event code, such that an EAS Participant may opt to have some Event codes poll IPAWS automatically upon receipt of an EAS message, but also have other Event codes proceed with the existing "first in – first out" processing of EAS vs. CAP messages.

The assumption is that an EAS Participant may wish to exercise discretion in putting speed of EAS processing over the possibility of obtaining additional information or first generation audio, which may be of superior quality. While the automatically CAP polling feature may take only 3 to 10 seconds to complete, this may be additional time that an EAS Participant does not desire to impose before airing certain EAS Event codes. One such example case may be a Tornado Warning (TOR), which is currently primarily disseminated by the NWS via conventional EAS (not CAP), and an additional attempt to poll IPAWS would be superfluous since at this time there would likely be no accompanying CAP message resident on the IPAWS OPEN server.[7]

2.2 Operation for National Event Codes

At present, we do not intend to introduce this feature in relation to the EAN and NPT Event codes, due to the requirement that the alert message be transmitted immediately upon receipt.[8]

As noted, we would desire clarification from the FCC as to whether our triggered polling method is permissible in conjunction with the EAN and NPT under the current rules, which appear to require the EAN and NPT to be transmitted immediately upon receipt of a broadcast EAS source message, if that were to arrive first.

---

[7] This current situation of NWS weather alerts not being available on the IPAWS OPEN system is, to the best of our understanding, a temporary situation until such future time that NWS and FEMA begin dissemination of NWS CAP messages via IPAWS OPEN. At that time, the EAS Participant may elect to enable the immediate CAP polling feature for any remaining Event codes that typically emanate from NWS.

[8] §11.51 (n), §11.54 (a) and §11.56 (a).

However, we are prepared to revisit our decision and include this functionality for the NPT and EAN Event codes should the FCC clarify the following questions:

- Is any potential delay or latency permissible in light of the "immediacy" requirements of §11.51 (n) and §11.56 (a), should this enhancement be incorporated in conjunction with the EAN and NPT Event codes?
- If so, would the FCC desire either or both of the EAN and NPT codes to also be furnished with this immediate CAP polling capability?
- What is the maximum delay or latency that would be acceptable to the FCC, in order to allow for this function to be accomplished?

As suggested in our Comments filed on 26 May, it could be argued that the few seconds that may be required to additionally poll the IPAWS OPEN system may be sufficiently limited and necessary as to fall within the Commission's intent of "immediate" transmission of these alerts. However, our proposed course of action is to first implement this capability for non-National Event codes, allowing a period of field testing and evaluation that would provide the Commission solid information on any latency introduced via this enhancement.[9]

3 Cost Impact

At this time, we do not intend to impose any additional cost on EAS Participants, based on the implementation we have outlined above. Any user of version 3.0 or higher would be provided with this software update without charge.

By providing this update within the normal software release cycle, our intention is also to minimize any additional costs for EAS Participants related to the maintenance of their EAS equipment, as this functionality would be provided as part of a regularly scheduled software update.

4 Conclusion

We appreciate the Commission's continued attention to the enhancement of the nation's Emergency Alert System. We believe the software modifications we discuss here are in congruence with the current rules governing the EAS system, and we further believe such enhancements do not require any additional action on the part of the FCC insofar as they pertain to those Event codes that already allow delays well in excess of any minor latency this automatic polling option may entail.

---

[9] Monroe Comments, p.15.

However, FCC clarification will be required in order to determine whether this same automatic polling methodology can and should be applied to the EAN and NPT Event codes.

Respectfully submitted,

Monroe Electronics, Inc.

/s/ *Edward* Czarnecki
Edward Czarnecki
Senior Director – Strategy and
Global Government Affairs
MONROE ELECTRONICS, INC.

9 January 2016